

January 23, 2001

VIA CERTIFIED MAIL

Mr. Robert E. Heskett
Bemis Company, Inc.
1350 North Fruitridge Avenue
PO Box 905
Terre Haute, IN 47808-0905

Re: Significant Source Modification No:
167-12790-00033

Dear Mr. Heskett:

Bemis Company, Inc. applied for a Part 70 operating permit on June 24, 1996 for plastic film processing and printing operations. An application to modify the source was received on September 8, 2000. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

1. Windmoeller & Hoelscher Olympia six color flexographic printing press, identified as Press 34, with a maximum print width of 51 inches and a maximum line speed of 1100 feet per minute, using catalytic incineration as control, and primarily exhausting to stack I-12.
2. Windmoeller & Hoelscher Olympia six color flexographic printing press, identified as Press 35, with a maximum print width of 51 inches and a maximum line speed of 1100 feet per minute, using catalytic incineration as control, and primarily exhausting to stack I-12.
3. Dec-E-Tec model CI-Eagle 12,750-HT HE 65 Catalytic Incinerator, identified as Unit 12 (or I-12), with a maximum supplemental fuel burner capacity of 3.5 million BTU per hour (utilizing natural gas), a minimum inlet temperature to the oxidizing zone of 500 EF, and a maximum air flow rate of 12,925 acfm. This unit exhausts to stack I-12.

The proposed Significant Source Modification approval will be incorporated into the pending Part 70 permit application pursuant to 326 IAC 2-7-10.5(l)(3). If there are no changes to the proposed construction of the emission units, the source may begin operating on the date that VCAPC and IDEM receive an affidavit of construction pursuant to 326 IAC 2-7-10.5(h). If there are any changes to the proposed construction the source can not operate until an Operation Permit Validation Letter is issued.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call 812-462-3433 ask for Rob Harmon or extension 14.

Sincerely,

George M. Needham, Director
Vigo County Air Pollution Control

Attachments
RKH

cc: Mindy Hahn - IDEM-OAQ, Permit Branch
Winter Bottum - IDEM-OAQ

**PART 70 SIGNIFICANT SOURCE MODIFICATION
OFFICE OF AIR QUALITY
and
VIGO COUNTY AIR POLLUTION CONTROL**

**Bemis Company, Inc.
1350 North Fruitridge Ave.
Terre Haute, Indiana 47804**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Source Modification No.: 167-12790-00033	
Issued by: George M. Needham, Director Vigo County Air Pollution Control	Issuance Date: January 23, 2001

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SECTION A

SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Quality (IDEM), Office of Air Quality (OAQ) and Vigo County Air Pollution Control (VCAPC). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary flexible packaging production facility that includes extrusion of polyethylene film, converting, and printing operations.

Responsible Official:	Robert E. Heskett
Source Address:	1350 North Fruitridge Ave., Terre Haute, Indiana 47804
Mailing Address:	P.O. Box 905, Terre Haute, Indiana 47808
Phone Number:	(812) 466-2213
SIC Code:	2673 and 3079
County Location:	Vigo County
County Status:	Maintenance for SO ₂ Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source is approved to construct and operate the following emission units and pollution control devices:

- (a) Windmoeller & Hoelscher Olympia six color flexographic printing press, identified as Press 34, with a maximum print width of 51 inches and a maximum line speed of 1100 feet per minute, using catalytic incineration as control, and primarily exhausting to stack I-12.
- (b) Windmoeller & Hoelscher Olympia six color flexographic printing press, identified as Press 35, with a maximum print width of 51 inches and a maximum line speed of 1100 feet per minute, using catalytic incineration as control, and primarily exhausting to stack I-12.
- (c) Dec-E-Tec model CI-Eagle 12,750-HT HE 65 Catalytic Incinerator, identified as Unit 12 (or I-12), with a maximum supplemental fuel burner capacity of 3.5 million BTU per hour (utilizing natural gas), a minimum inlet temperature to the oxidizing zone of 500 EF, and a maximum air flow rate of 12,925 acfm. This unit exhausts to stack I-12.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);

SECTION B GENERAL CONSTRUCTION CONDITIONS

B.1 Permit No Defense [IC 13]

This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions [326 IAC 2-7-1]

Terms in this approval shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Significant Source Modification [326 IAC 2-7-10.5(h)]

This document shall also become the approval to operate pursuant to 326 IAC 2-7-10.5(h) when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to Vigo County Air Pollution Control (VCAPC), verifying that the emission units were constructed as proposed in the application. The emissions units covered in the Significant Source Modification approval may begin operating on the date the affidavit of construction is postmarked or hand delivered to VCAPC if constructed as proposed.
- (b) If actual construction of the emissions units differs from the construction proposed in the application, the source may not begin operation until the source modification has been revised pursuant to 326 IAC 2-7-11 or 326 IAC 2-7-12 and an Operation Permit Validation Letter is issued.
- (c) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (d) The Permittee shall receive an Operation Permit Validation Letter from the Director of Vigo County Air Pollution Control (VCAPC) and attach it to this document.

However, in the event that the Title V application is being processed at the same time as this application, the following additional procedures shall be followed for obtaining the right to operate:

- (1) If the Title V draft permit has not gone on public notice, then the change/addition covered by the Significant Source Modification will be included in the Title V draft.

- (2) If the Title V permit has gone thru final EPA proposal and would be issued ahead of the Significant Source Modification, the Significant Source Modification will go thru a concurrent 45 day EPA review. Then the Significant Source Modification will be incorporated into the final Title V permit at the time of issuance.
- (3) If the Title V permit has not gone thru final EPA review and would be issued after the Significant Source Modification is issued, then the Modification would be added to the proposed Title V permit, and the Title V permit will issued after EPA review.

B.6 Local Agency Requirement

This permit shall also be considered to be the local permit, a separate application and approval is not required.

SECTION C **GENERAL OPERATION CONDITIONS**

C.1 Certification ~~[326 IAC 2-7-4(f)]~~~~[326 IAC 2-7-6(1)]~~~~[326 IAC 2-7-5(3)(C)]~~

- (a) Where specifically designated by this approval or required by an applicable requirement, any application form, report, or compliance certification submitted under this approval shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

C.2 Preventive Maintenance Plan ~~[326 IAC 2-7-5(1),(3) and (13)]~~ ~~[326 IAC 2-7-6(1) and (6)]~~
~~[326 IAC 1-6-3]~~

- (a) If required by specific condition(s) in Section D of this approval, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety days after issuance of this approval, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

And

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ and VCAPC, upon request and shall be subject to review and approval by IDEM, OAQ and VCAPC. IDEM, OAQ and VCAPC, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this approval.
- (b) Any application requesting an amendment or modification of this approval shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

And

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

C.4 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this approval:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.5 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this approval, all air pollution control equipment listed in this approval and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

Testing Requirements [326 IAC 2-7-6(1)]

C.6 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]

- (a) Compliance testing on new emission units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ and VCAPC

A test protocol, except as provided elsewhere in this approval, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

And

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ and VCAPC within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ and VCAPC, if the source submits to IDEM, OAQ and VCAPC, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.7 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this approval. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.8 Temperature Measurement Specifications

Whenever a condition in this permit requires the measurement of temperature in part of the unit or its control device, the device employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.9 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this approval;
 - (3) The Compliance Monitoring Requirements in Section D of this approval;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this approval; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this approval. CRP's shall be submitted to IDEM, OAQ and VCAPC upon request and shall be subject to review and approval by IDEM, OAQ and VCAPC. The CRP shall be prepared within ninety (90) days after issuance of this approval by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this approval; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this approval, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the approval unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

- (2) The Permittee has determined that the compliance monitoring parameters established in the approval conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the approval, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**C.10 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this approval exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ and VCAPC, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAQ and VCAPC shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ and VCAPC within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ and VCAPC reserve the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ and VCAPC that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ and VCAPC may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.11 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this approval shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this approval is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this approval.

- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM and VCAPC may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.12 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ and VCAPC, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or VCAPC makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or VCAPC within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this approval;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with

the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this approval, and whether a deviation from an approval condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance.

C.13 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) The reports required by conditions in Section D of this approval shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

And

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

- (b) Unless otherwise specified in this approval, any notice, report, or other submission required by this approval shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and VCAPC, on or before the date it is due.
- (c) Unless otherwise specified in this approval, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) The first report shall cover the period commencing on the date of issuance of this approval and ending on the last day of the reporting period.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (a) Windmoeller & Hoelscher Olympia six color flexographic printing press, identified as Press 34, with a maximum print width of 51 inches and a maximum line speed of 1100 feet per minute, using catalytic incineration as control, and primarily exhausting to stack I-12.
- (b) Windmoeller & Hoelscher Olympia six color flexographic printing press, identified as Press 35, with a maximum print width of 51 inches and a maximum line speed of 1100 feet per minute, using catalytic incineration as control, and primarily exhausting to stack I-12.
- (c) Dec-E-Tec model CI-Eagle 12,750-HT HE 65 Catalytic Incinerator, identified as Unit 12 (or I-12), with a maximum supplemental fuel burner capacity of 3.5 million BTU per hour (utilizing natural gas), a minimum inlet temperature to the oxidizing zone of 500 EF, and a maximum air flow rate of 12,925 acfm. This unit exhausts to stack I-12.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOCs) Use [326 IAC 2-2]

The VOC content delivered to the two printing presses (press 34 and press 35) combined shall not exceed 337.31 tons per 12-month period, rolled monthly. This condition, in combination with the capture and destruction efficiency requirements, result in the addition of these presses not being subject to the provisions of 326 IAC 2-2 (Prevention of Significant Deterioration).

D.1.2 Volatile Organic Compounds (VOCs) [326 IAC 8-5-5][326 IAC 2-2]

The two printing presses (press 34 and press 35) shall be constructed and operated in such a manner to attain and maintain a 100% VOC capture efficiency. This condition, along with the incineration requirements below, will also satisfy the requirements of 326 IAC 8-5-5 (Graphic Arts Operations) which requires a minimum 60% overall control efficiency for flexographic printing.

The incinerator (Unit 11) shall maintain a minimum destruction efficiency of 95%. This condition will also satisfy the requirements of 326 IAC 8-5-5 (Graphic Arts Operations) which requires either a minimum destruction efficiency of 90% or solvent content limitations.

This condition, in combination with the VOC use limitation above, result in the addition of these presses not being subject to the provisions of 326 IAC 2-2 (Prevention of Significant Deterioration).

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

Within sixty (60) days after achieving maximum production rates, but no later than 180 days after initial start-up, the Permittee shall perform VOC capture efficiency tests on both printing presses, as well as a destruction efficiency test on the incinerator, utilizing standard methods from 40 CFR 60 Appendix A,

or other methods as approved by the IDEM, OAQ and VCAPC. These tests shall be performed at least once every five years from the date of this valid compliance demonstration. In addition to these requirements, IDEM, OAQ and VCAPC may require compliance testing when necessary to determine if the facilities are in compliance. This testing shall also meet the requirements, including notifications, of Condition C.6 of this permit and 326 IAC 3-6.

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ and VCAPC, reserve the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.6 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.1.7 VOC Control

The catalytic incineration system shall be in use any time the printing presses are in operation. When operating the catalytic incinerator shall maintain a minimum catalyst bed inlet temperature of 500 EF in order to ensure the minimum 95% VOC destruction efficiency is attained. A record of the required incinerator temperature shall be logged continuously and maintained. An automated system to shut down the associated printing presses whenever the minimum temperature can not be maintained ensures compliance with this condition.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.8 Monitoring

The Permittee shall conduct quarterly inspections of all components relating to the capture system. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

The Permittee shall also conduct annual sampling and testing of the catalyst utilized in the catalytic incinerator in order to determine if it has reached a point where the effectiveness is diminished to a point where compliance with the minimum destruction efficiency is at risk. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.1.1.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) The cleanup solvent usage for each month;

- (3) The total VOC usage for each month; and
 - (4) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.7 and Condition D.1.8, records of each press and each incinerator operating times shall be kept. These records shall be in a format sufficient to demonstrate compliance with the conditions, and shall also include a specific listing of times that printing operations were interrupted (including the reasons) due to incinerator related problems. Finally, a certification that each incinerator was operated at no less than the minimum permitted catalyst inlet bed temperature at all times it was in operation shall be included, unless this was not the case. If the incinerator was ever below the minimum temperatures then a detailed explanation shall be included.
- (c) To document compliance with Condition D.1.8, the Permittee shall maintain records of each inspection or sample. These records shall include, as a minimum, dates, initials of the person performing the inspection or taking the sample, results, and corrective actions (if required).
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. Included with this report shall be a log of all times the minimum inlet catalyst bed temperature specified in Condition D.1.7 fell below the required minimum reading.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
VIGO COUNTY AIR POLLUTION CONTROL

PART 70 SOURCE MODIFICATION
CERTIFICATION**

Source Name: Bemis Company, Inc.
Source Address: 1350 North Fruitridge Ave, Terre Haute, Indiana 47804
Mailing Address: PO Box 905, Terre Haute, Indiana 47808
Source Modification No.: 167-12790-00033

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this approval.**

Please check what document is being certified:

- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
VIGO COUNTY AIR POLLUTION CONTROL**

Part 70 Source Modification Quarterly Report

Source Name: Bemis Company, Inc
Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804
Mailing Address: PO Box 905, Terre Haute, Indiana 47808
Source Modification No.: 167-12790-00033
Facility: Press 34 and Press 35, Incinerator I-12
Parameter: Combined VOC input, inlet catalyst bed temperature
Limit: 337.31 tons of VOC per 12-month period, 500 EF minimum

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Catalyst bed inlet temperature was maintained at the minimum whenever the associated printing presses were in operation.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**Indiana Department of Environmental Management
Office of Air Quality
and
Vigo County Air Pollution Control**

Addendum to the
Technical Support Document for a Significant Source Modification

Source Name: Bemis Company, Inc.
Source Location: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804
County: Vigo County
SIC Code: 2673 and 3079
Source Modification No: 167-12790-00033
Permit Reviewer: Rob Harmon

On October 30, 2000, Vigo County Air Pollution Control (VCAPC) had a notice published in the Terre Haute Tribune-Star, Terre Haute, Indiana, stating that Bemis Company, Inc. had applied for a source modification to construct and operate two flexographic printing presses. The notice also stated that VCAPC and OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, OAQ and VCAPC have made the following changes to the final significant source modification (changes are bolded for emphasis):

1. As of January 1, 2001 the Office of Air Management (OAM) was renamed the Office of Air Quality (OAQ). All references to that office in the approval were updated accordingly.
2. The specific compliance methods relating to the minimum catalyst bed inlet temperature was not clear in Conditions D.1.7 and D.1.10. Those three (2) conditions were upgraded as follows:

D.1.7 VOC Control

The catalytic incineration system shall be in use any time the printing presses are in operation. When operating the catalytic incinerator shall maintain a minimum catalyst bed inlet temperature of 500 EF in order to ensure the minimum 95% VOC destruction efficiency is attained. A record of the required incinerator temperature shall be **logged continuously and maintained. An automated system to shut down the associated printing presses whenever the minimum temperature can not be maintained ensures compliance with this condition.**

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 ~~and D.1.7~~ shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. **Included with this report shall be a log of all times the minimum inlet catalyst bed temperature specified in Condition D.1.7 fell below the required minimum reading.**

Appendix A: Emission Calculations

Bemis Company, Inc.
 1350 North Fruitridge Ave., Terre Haute, Indiana 47804
 Sig Source Mod: 167-12790-00033
 Reviewed By: Rob Harmon
 Application Received: September 8, 2000

Bemis Company, Inc. has previously petitioned that their potential would be more accurately be assessed by taking the maximum linespeed and a normal coating rate. This calculation can be checked by taking the maximum coating rate and the normal linespeed of the printing press. Since this method was previously approved and used in several construction permits, I am using it in this case as well.

VOC From Printing Press Operations
Maximum linespeed with the average coating rate case:

Throughput

Press ID	Max line speed (feet per min)	Max print width (inches)	Million square inches per year (MMin ² /Yr)
W&H Olympia 726 #34	1100	51	353833.92
W&H Olympia 726 #35	1100	51	353833.92
		total	707667.84

Ink VOCs

Ink Name	Max Coverage (lbs/MMin ²)	Weight % Volatiles	Flash Off (percent)	Throughput (MMin ² /Yr)	Emissions (Ton/Yr)
Fast Solvent	0.14	100.00%	100.00%	707667.84	49.54
Slow Solvent	0.16	100.00%	100.00%	707667.84	56.61
Ink (colors)	0.43	57.00%	100.00%	707667.84	86.72
Ink (High Solids White)	0.7	35.00%	100.00%	707667.84	86.69
N-Propyl Acetate	0.06	100.00%	100.00%	707667.84	21.23
Glycol Ether (propylene)	0	100.00%	100.00%	707667.84	0.00
Total VOC Emissions (Ton per Year)					300.79

METHODOLOGY

Throughput = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin² per Year

VOC = Maximum Coverage pounds per MMin² * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93))

Appendix A: Emission Calculations

Bemis Company, Inc.
 1350 North Fruitridge Ave., Terre Haute, Indiana 47804
 Sig Source Mod: 167-12790-00033
 Reviewed By: Rob Harmon
 Application Received: September 8, 2000

VOC From Printing Press Operations
Maximum linespeed with the average coating rate case:

Throughput

Press ID	Max line speed (feet per min)	Max print width (inches)	Million square inches per year (MMin ² /Yr)
W&H Olympia 726 #34	760	48	230086.656
W&H Olympia 726 #35	760	48	230086.656
		total	460173.312

Ink VOCs

Ink Name	Max Coverage (lbs/MMin ²)	Weight % Volatiles	Flash Off (percent)	Throughput (MMin ² /Yr)	Emissions (Ton/Yr)
Fast Solvent	0.22	100.00%	100.00%	460173.312	50.62
Slow Solvent	0.3	100.00%	100.00%	460173.312	69.03
Ink (colors)	0.8	57.00%	100.00%	460173.312	104.92
Ink (High Solids White)	1.3	35.00%	100.00%	460173.312	104.69
N-Propyl Acetate	0.03	100.00%	100.00%	460173.312	6.90
Glycol Ether (propylene)	0.005	100.00%	100.00%	460173.312	1.15
Total VOC Emissions (Ton per Year)					337.31

METHODOLOGY

Throughput = Maximum line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin² per Year

VOC = Maximum Coverage pounds per MMin² * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing (9/93))

The worst case is the maximum coverage with the average linespeed and print width. Using this worse case both the before and after control potential emissions can be quantified.

337.31	Potential Emissions of VOC (tons per year) before control
100.00%	Capture Efficiency
95.00%	Destruction Efficiency
95.00%	Effective Control Efficiency
16.87	Potential Emissions of VOC (tons per year) after control

METHODOLOGY

Effective Control Efficiency = Capture Efficiency * Destruction Efficiency (both in fraction form)

Pot After Control = Pot Before Control * (1 - Effective Control Efficiency (in fraction form))

Appendix A: Emission Calculations

Bemis Company, Inc.
 1350 North Fruitridge Ave., Terre Haute, Indiana 47804
 Sig Source Mod: 167-12790-00033
 Reviewed By: Rob Harmon
 Application Received: September 8, 2000

Potential Emissions from Incinerator Fuel Use

Heat Input Capacity
 MMBtu/hr

Potential Throughput
 MMCF/yr

3.5

30.7

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.03	0.12	0.01	1.53	0.08	1.29

*PM emission factor is filterable PM only. PM10 emission factor is condensable and filterable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

Appendix A: Emission Calculations

Bemis Company, Inc.
 1350 North Fruitridge Ave., Terre Haute, Indiana 47804
 Sig Source Mod: 167-12790-00033
 Reviewed By: Rob Harmon
 Application Received: September 8, 2000

Total Potential Emissions Before Control

Facility	PM	PM10	SO2	NOx	VOC	CO
Printing Presses					337.31	
Incinerator Fuel Consumption	0.03	0.12	0.01	1.53	0.08	1.29
Total	0.03	0.12	0.01	1.53	337.39	1.29

Total Potential Emissions After Control

Facility	PM	PM10	SO2	NOx	VOC	CO
Printing Presses					16.87	
Incinerator Fuel Consumption	0.03	0.12	0.01	1.53	0.08	1.29
Total	0.03	0.12	0.01	1.53	16.95	1.29
PSD Significant Threshold	25	15	40	40	40	100
Significant ?	N	N	N	N	N	N